

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NO. 19-CR-3113-JB

ROBERT PADILLA, a.k.a. "Fat Head,"
ROSE ANN ROMERO,
JOHNATHAN VIGIL, a.k.a. "Lil John,"
ROBERT HOCKMAN, a.k.a. "Tony,"
MARCOS RUIZ, a.k.a. "Mark,"
LUIS SANCHEZ, a.k.a. "Payaso,"
ASHLEY ROMERO,
TOMAS SANCHEZ, a.k.a. "T.J.,"
AMANDA SILVA,
SERGIO VALDEZ,
GENEVIVE ATENCIO, and
JANAYA ATENCIO,

Defendant.

DEFENSE STIPULATION TO SET TRIAL IN APRIL 2021

Based on the information available to the parties on February 12, 2020, parties agree that the trial in this matter should be set on April 19, 2021. An indictment was filed September 11, 2019, this case was declared complex on October 29, 2019 and the prosecution began sending out discovery in this case on December 31, 2020. At the time of the scheduling hearing on February 12, 2020 it was believed that the defense would be receiving a total of two (2) terabytes of data when discovery was completed, as nearly 33% of the discovery in this case had not been turned over. Based on this, the complexity of the case and the numerous deadlines in this case, parties agree that at this time an April 2021 trial date would allow each defense to conduct their investigations into this case, prepare and file pretrial motions, negotiate possible settlements for

their clients and to adequately prepare for trial. This trial date is not predicated upon the congestion of the Court's docket but is believed to balance the defendants' interests with the public' interest.

Respectfully submitted:

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/s/ Thomas Clark

Thomas Clark
Attorney for Robert Hockman

/s/ Michael Alarid

Michael Alarid
Attorney for Marcos Ruiz

/s/ Charles Knoblauch

Charles Knoblauch
Attorney for Tomas Sanchez

/s/ Susan Burgess Farrell

Susan Burgess Farrell
Attorney for Amanda Silva

/s/ Philip Sapien

Philip Sapien
Attorney for Sergio Valdez

/s/ Michael Davis

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Attorney for Genevive Atencio

/s/ Jennifer Wernersbach
Jennifer Wernersbach
Attorney for Janaya Atencio

I HEREBY CERTIFY that on the 18th day of February 2020, I filed the foregoing electronically through the CM/ECF filing system, which caused all counsel to be served by electronic means.

/s/ Diego R. Esquibel
Diego R. Esquibel